

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 1, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write to provide the Court with the notification that the Court directed in the Court's May 10, 2021 Order [ECF No. 6801], regarding the parties' meet and confer and the date set for Wa'el Jelaidan's deposition.

On May 20, 2021, the PECs asked Martin McMahon and Richard Sandza, counsel for defendant Wa'el Jelaidan in this MDL, for available dates for Mr. Jelaidan's deposition. On May 21, 2021, Mr. Sandza responded that counsel had reached out to Mr. Jelaidan's representatives in Saudi Arabia, had not heard back, but that they were aware of the June 1 deadline and would continue to press them to get a date. This afternoon, Mr. Sandza advised the PECs that "Mr. Jelaidan is available on August 26, 2021 for his deposition in Saudi Arabia." The PECs have advised Mr. Jelaidan that the August 26 date is acceptable and clarified that the deposition will be conducted pursuant to the terms of the Court's recent and previous orders addressing his deposition.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

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The Honorable Sarah Netburn
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cc: The Honorable George Daniels, via ECF
All Counsel of Record via ECF